

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

**SECURITIES INVESTOR PROTECTION
CORPORATION,**

Plaintiff-Applicant,

V.

**BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,**

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

**IRVING H. PICARD, Trustee for the
Liquidation of Bernard L. Madoff
Investment Securities LLC,**

Plaintiff,

V.

HSBC BANK PLC, *et al.*,

Defendants.

STIPULATION TO FILE AMENDED ANSWER AND AFFIRMATIVE DEFENSES

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff Irving H. Picard,
as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under

the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–III and the substantively consolidated estate of Bernard L. Madoff and Defendant Alpha Prime Fund Limited, by and through their respective counsel, that Alpha Prime Fund Limited may file an Amended Answer and Affirmative Defenses, a copy of which is attached hereto as Exhibit A.

Dated: New York, NY
August 18, 2021

/s/ Geoffrey A. North

Baker & Hostetler LLP

45 Rockefeller Plaza, 11th Floor

New York, New York 10111

Telephone: (212) 589-4200

Facsimile: (212) 589-4201

Oren J. Warshavsky

Email: owarshavsky@bakerlaw.com

Geoffrey A. North

Email: gnorth@bakerlaw.com

*Attorneys for Plaintiff Irving H. Picard,
trustee for the Substantively Consolidated
SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and the estate of
Bernard L. Madoff*

/s/ Todd E. Duffy

DuffyAmedeo LLP

132 W. 31st Street, 9th Floor

New York, NY 10001

Telephone: (212) 729-5832

Facsimile: (212) 208-2437

Todd E. Duffy

Email: tduffy@duffyamedeo.com

Douglas A. Amedeo

Email: damedeo@duffyamedeo.com

*Attorneys for Defendant Alpha Prime Fund
Ltd.*

IT IS SO ORDERED:

**Dated: August 19, 2021
Poughkeepsie, New York**



/s/ Cecelia G. Morris

**Hon. Cecelia G. Morris
Chief U.S. Bankruptcy Judge**